



State of Ohio Environmental Protection Agency

**Southwest District Office**

401 East Fifth Street  
Dayton, Ohio 45402-2911  
(513) 285-6357  
FAX (513) 285-6249

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George V. Voinovich  
Governor

November 22, 1999

Mr. Johnny Reising  
U.S. Department of Energy, Fernald Area Office  
P.O. Box 538705  
Cincinnati, OH 45253-8705

**RE: COMMENTS - PSP FOR A1P2 CERTIFIED FOR REUSE AREAS, TRAP RANGE, SECTOR 2C, AND SECTOR 3 CERTIFICATION SAMPLING**

Dear Mr. Reising:

Ohio EPA has reviewed DOE's November 1, 1999 submittal on the "Project Specific Plan for Area 1, Phase II Certified for Reuse Areas, Trap Range, Sector 2C, and Sector 3 Certification Sampling". Ohio EPA approves the sampling of all Certification Units, with the exception of A1P2-S3HR-04, A1P2-S3SA-02 and A1P2-S2SA-09. Attached are Ohio EPA's comments on the document.

If you have any questions, please contact Donna Bohannon, Michelle Waller or me.

Sincerely,

*Michelle Waller for*

Thomas A. Schneider  
Fernald Project Manager  
Office of Federal Facilities Oversight

cc: Jim Saric, U.S. EPA  
Terry Hagen, FDF  
Ruth Vandergrift, ODH  
Mark Shupe, HSI GeoTrans  
Francie Hodge, Tetra Tech EM Inc.

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**Ohio EPA Comments on the PSP for A1P11 Certified for  
Reuse Areas, Trap Range, Sector 2C and Sector 3 Certification Sampling**

1.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.1                      Pg. #: 2-3      Line #: 2-6                      Code: C  
Original Comment #:

Comment: A.) How will the top 6 inches of native soil be determined?

B.) OEPA does not feel that one sample from each CU that was part of Removal Action 14 is enough. More samples need to be added to ensure all contamination was removed during RA 14. Also, please include a map showing the locations of RA 14 overlaid on the current CUs and sampling locations.

C.) Has any characterization been done on the fill which was 'from an unknown source'?

D.) This section needs to state that if contamination is found at depth, the soil will be dug up and resampled.

2.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: Figure 2-3                      Pg. #:                      Line #:                      Code: C  
Original Comment #:

Comment: The CU east of S2-NI-03 and S2-NI-04 is not labeled. Please correct.

3.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 2.3.2                      Pg. #: 2-6      Line #: 28-32                      Code: C  
Original Comment #:

Comment: As discussed in a phone call on November 8, 1999 with FDF personnel, OEPA feels that all suite designators for the samples should be designated before the sample collection. In doing so, the possibility of errors being made by the sampling crew can be eliminated. Please revise the document to include designators for all samples in the PSP.

**Data Quality Objectives**

4.) Commenting Organization: OEPA                      Commentor: OFFO  
Section #: 7.0                      Pg. #: 9 of 12                      Line #:                      Code: C  
Original Comment #:

Comment: The paragraph labeled Physical Samples specifies areas in A2P3 which are not within the scope of this project. Please correct.